

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: KURT DOUGLASS FRITZ WENDLOLYN M. DOUGLASS Debtors, SERVBANK, SB Movant, v. KURT DOUGLASS FRITZ, and WENDLOLYN M. DOUGLASS, and SCOTT F. WATERMAN, Trustee, Respondents.	Bankruptcy No. 25-10081-pmm Chapter 13
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STIPULATION RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Servbank, SB (the “Movant”), by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtors, Kurt Douglass Fritz and Wendlolyn M. Douglass (the “Debtors”), by and through their undersigned counsel, Michael A. Cibik, Esquire, and together file this *Stipulation Resolving Motion for Relief from the Automatic Stay* (the “Stipulation”), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.

1. Servbank, SB holds a mortgage (the “Mortgage”) on Debtors’ real property located at 119 Ardmore Avenue, Reading, Pennsylvania 19607.

2. As of the date of this Stipulation, the Debtors are in default of their post-petition payment obligations to Movant in the amount of \$13,898.76, which includes \$350.00 in Bankruptcy fees and \$199.00 in Bankruptcy cost.

3. Debtors will cure the remaining post-petition arrears:

- a. By adding \$2,316.46 to each monthly payment to Movant starting with the August 1, 2025, post-petition payment until the post-petition arrears are cured, as outlined in paragraph 3c.
- b. Starting August 1, 2025, the Debtors shall, timely, make all future post-petition monthly payments to Movant pursuant to the terms of the Note.
- c. The stipulated cure payments and due dates will be as follows:

August 1, 2025	\$2,316.46
September 1, 2025	\$2,316.46
October 1, 2025	\$2,316.46
November 1, 2025	\$2,316.46
December 1, 2025	\$2,316.46
January 1, 2026	\$2,316.46

4. Debtors shall direct the payments to:

Servbank, SB
3138 E Elwood Street
Phoenix, AZ 85034

Payments must be received by Movant at the above-referenced address on or before the 1st day of each month. Debtors will be in default under the Stipulation in the event that the Debtors fail to comply with the payment terms and conditions in Paragraph 4, *supra*. If Debtors default under this Stipulation, Movant may send Debtors and Debtors' counsel a Notice of Default. Debtors will have thirty (30) days from the date of the Notice of Default to cure the default. If default is not cured after thirty days, a Certification of Default will be immediately filed with the Court by the Movant.

5. In the event the instant bankruptcy case is converted to a case under Chapter 7 of the Bankruptcy Code, the Debtors shall cure the pre-petition and post-petition arrears within thirty (30) days from the date of such conversion. Should the Debtors fail to cure said arrears

within the thirty-day period, such failure shall be deemed a default under the terms of this Stipulation and Movant may send Debtors and counsel a written Notice of Default. If the default is not cured within thirty (30) days from the date of the notice, counsel for Movant may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the automatic stay as to the Mortgage.

6. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

Agreed to by:

By: /s/ Keri P. Ebeck
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Counsel for the Debtors

By: /s/ Rolando Ramos for
Scott F. Waterman,
Standing Chapter 13 Trustee

Dated: July 31, 2025